

# GREEN KAMINER MIN & ROCKMORE LLP

## Manhattan

420 Lexington Ave., Ste 2821  
New York, New York 10170  
T.212.681.6400

## Long Island

600 Old Country Rd., Ste. 410  
Garden City, New York 11530  
T. 516.858.2115

January 10, 2025

## VIA ECF

Honorable Natasha C. Merle  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
Email: EMCCRD@cand.uscourts.gov

Re: *Correa Morales v. Escobar Restrepo – Expedited Joint Letter Motion*  
Case No. 1:24-cv-07951-NCM-TAM

Dear Judge Merle:

This firm represents the Petitioner in the above captioned Hague Convention proceeding. We write jointly with consent of Respondent's counsel to respectfully request that the Court issue an amended pretrial schedule for the above-referenced case.

On December 19, 2024, the parties filed a stipulation proposing a joint pretrial schedule [ECF No. 13]. On December 23, 2024, the Court issued an order granting the stipulation with a few modifications. In light of these modifications and the continuance of the trial dates, the parties have conferred and agreed to an amended pretrial schedule. Annexed hereto as Exhibit A is the parties' proposed amended pretrial schedule.

Further, on January 2, 2025, the parties jointly filed a letter, *inter alia*, seeking to reschedule the hearing on the petition to a date after January 29, 2025. [ECF No. 15]. In response to the Joint Letter Motion, the Court issued an order rescheduling trial in this matter to February 5 and 6, 2025. [Notice of Electronic Filing, dated January 2, 2025]. On January 7, 2025, the parties jointly filed a letter requesting continuance of trial to the second week of February at any time that is convenient for the Court, except for February 11th, when Mr. Min will be appearing in another trial. [ECF No. 17]. Our proposed Amended Scheduling Order, attached hereto as Exhibit B, allows for the Court to set new trial dates at its discretion should it deem a trial continuance appropriate.

Thank you very much for your consideration in this matter.

Very truly yours,

/s/Richard Min  
Richard Min

*Attorney for Petitioner*

cc: All Counsel (by ECF)